

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CHRISTOPHER UNDERWOOD et al.,	:
Individually and on Behalf of All Others Similarly	:
Situated,	:
	:
<i>Plaintiffs,</i>	:
	:
v.	:
	:
COINBASE GLOBAL, INC.,	:
	:
<i>Defendant.</i>	:
	x -----

**DECLARATION OF LARA A. FLATH  
IN OPPOSITION TO PLAINTIFFS' MOTION FOR A  
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION**

LARA A. FLATH, pursuant to 28 U.S.C. § 1746, declares as follows:

1. I am a member of the law firm of Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Defendant Coinbase Global, Inc. (“Global”) in this lawsuit, and an attorney duly admitted to practice in this Court. I represent both Global and non-party Coinbase, Inc.
2. I submit this declaration in support of Defendant’s Opposition to Plaintiffs’ Motion for a Temporary Restraining Order (the “Opposition”) and to transmit to the Court true and correct copies of the following documents to which reference is made in the Opposition:

	<b>DESCRIPTION</b>
Exhibit A	Letter from Steven L. Bloch and Jordan A. Goldstein to Jay B. Kasner dated January 26, 2022.
Exhibit B	Letter from Lara A. Flath to Jordan A. Goldstein and Steven L. Bloch dated January 27, 2022.
Exhibit C	Email from Jordan Goldstein to Jay B. Kasner, Lara A. Flath, Alexander C. Drylewski, and Abigail E. Davis dated January 27, 2022, and time stamped 8:54 PM.

Exhibit D	Email from Lara A. Flath to Jordan Goldstein dated January 28, 2022, and time stamped 7:48 AM.
Exhibit E	Email from Jordan Goldstein to Jay B. Kasner, Lara A. Flath, Alexander C. Drylewski, and Abigail E. Davis dated January 28, 2022, and time stamped 9:16 AM.
Exhibit F	Email from Lara A. Flath to Jordan Goldstein dated January 28, 2022, and time stamped 10:04 AM.
Exhibit G	Email from Jordan Goldstein to Lara A. Flath, Jay B. Kasner, Alexander C. Drylewski, and Abigail E. Davis dated January 28, 2022, and time stamped 10:11 AM.
Exhibit H	Email from Lara A. Flath to Jordan Goldstein, Mitchell Nobel, Steven Bloch, and Ian Sloss dated January 29, 2022, and time stamped 4:50 PM.
Exhibit I	Email from Jordan Goldstein to Lara A. Flath, Jay B. Kasner, Alexander C. Drylewski, and Abigail E. Davis dated January 30, 2022, and time stamped 12:38 PM.
Exhibit J	Coinbase Global, Inc., Quarterly Report Pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 for the quarterly period ended September 30, 2021, Form 10-Q.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York

January 30, 2022

/s/ Lara A. Flath  
LARA A. FLATH